

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

BERNARD T. ANDERSON BEY, Plaintiff

v.

ROC NATION LLC, et al

1:24 cv 02295

Defendants

MOTION FOR 11 (b) SANCTIONS

Pursuant to FRCP 11 (b) Representations To The Court (1) for unnecessary delay and needlessly increasing the cost of litigation (3) for lack of evidentiary support and (4) the denials or factual contentions are warranted on the evidence, F.R.C.P. 12 (e) Motion For More Definite Statement, F.R.C.P. 12 (d) Result of Presenting Matters Outside The Pleadings and F.R.C.P. 56 (e) Failing to Properly Support or Address a Fact: WHEREAS, Pursuant to FRCP 11 (b) Representations To The Court (1) for unnecessary delay and needlessly increasing the cost of litigation (3) for lack of evidentiary support and (4) the denials or factual contentions are warranted on the evidence: And whereas there is a genuine dispute whereas the defendants denials are not based on any evidentiary support and have been submitted for an improper purpose and in violation of warranties on denials as to defendants Roc Nation LLC, Mr. Sean C. Carter, In the presentation of letter motions for leave to file motions to dismiss and motions to dismiss presently before the court have been submitted to unduly delay pretrial discovery and unnecessarily increasing the cost of litigation, seeking to have the claims dismissed on a pleading technicality and if evidentiary support is not provided for such allegations or denials presented in the motion to dismiss, should be stricken from the record, pursuant to F.R.C.P. 12 (e) Motion For More Definite Statement, (d) Result of Presenting Matters Outside The Pleadings and FRCP 56 (e) Failing to Properly Support or Address a Fact, and any elements of the claims

provided in the initial complaint that have been asserted and supported by admissible evidence attached to the initial complaint as exhibits docket entry 1 as well as those incorporated by reference pursuant to FRCP 10 (c), as well as those that have been deliberately avoided by counsel for the defendants should therefore be found as established. Relief Requested: WHEREFORE, I will request sanctions be imposed against stated defendants for attorney's fees and cost, if it is not withdrawn within the fair harbor notice requirement of 21 days from the date of this pre motion hearing request, furthermore, that such factual assertions, denials or facts deliberately avoided in the initial complaint not appropriately supported with evidence, will be for pretrial purposes be entered into the record of these proceedings as established. And alternatively, sanctions be imposed pursuant to 28 USC § 1927 Counsels Liability For Excessive Cost and the courts inherent authority to strike from the docket any presented document not filed in accordance with the local and federal rules of civil procedure. And any alternative and additional relief the court deems necessary and appropriate.

AFFIDAVIT IN SUPPORT

1. The defendants Mr. Sean C. Carter, Roc Nation LLC, Live Nation Entertainment Inc., and Coinbase have submitted motions to dismiss for an improper purpose pursuant to F.R.C.P. 11 (b) (1), whereas it causes undue delay and needlessly increased the cost of litigation and (4) that the denials of factual contentions are warranted on the evidence or, if specifically, so identified, are reasonably based on belief or a lack of information. Counsel for the defense has denied all allegations of both the initial and amended complaint which is not rebutted with required evidence in dispute, counsel for the defense has also stated that because the initial complaint was fully briefed on their M.T.D. they intend to raise almost identical legal arguments for the amended complaint, in their letter motions requesting a pre motion conference. Wherefore I object pursuant to FRE 802 Rule against hearsay: whereas the declarations rebutting the submitted evidence in support of the amended complaint are not of counsel for defense own knowledge and belief and lack affidavits or other evidence in support of such denials and 806 attacking and Supporting the Declarant, whereas it states: When a hearsay statement — or a statement described in Rule 801(d)(2)(C), (D), or (E) — has been admitted in evidence, the declarant's credibility may be attacked, and then supported, by any evidence that would be admissible for those purposes if the declarant had testified as a witness. The court may admit evidence of the declarant's inconsistent statement or conduct, regardless of when it occurred or whether the declarant had an opportunity to explain or deny it. If the party against whom the statement was admitted calls the declarant as a witness, the party may examine the declarant on the statement as if on cross-examination. Wherefore I move to call all defendants who have appeared in this proceeding, as witnesses, in relation thereto attacking the declarations based on the evidence presented in the Initial and Amended Complaint and all exhibits admitted by reference pursuant to FRCP 10 (c), in relation thereto.

- A)** Mr. Sean C. Carter's/ Roc Nation LLC's, Misrepresentation, and lack of evidentiary support from counsel for defense denials: In the amended complaint docket entry 58 Point 1 C) DEFENDANT MR. SEAN C. CARTER'S MISREPRESENTATION and the evidence in exhibits related thereto require impeachment of Mr. Sean C. Carter's denials with substantive testimony where they are disputed facts and the weight of the evidence does not support the denials. I move to impeach Mr. Sean C. Carter's statements as the declarant, to testify based upon the evidentiary support in accordance with FRE 806.
- B)** Coinbase's Pre Answer Motion As An Affirmative Defense Deliberately Avoids and Or Omits Responding To The Substance of The Assertions And Evidence In Support And Further Submits No Evidentiary Support In Rebuttal In Violation of FRCP 11 (b) (1) and (4) whereas it is submitted to cause undue delay and needlessly increase the cost of litigation and the denials of factual contention are not warranted on the evidence and have not been supported by any evidentiary supports in rebuttal to the complaint as stated in Docket Entry 1 Exhibit pages 37 to 43 Point 4. MISAPPROPRIATION PURSUANT TO DEFEND TRADE SECRETS ACT of the amended complaint docket entry 57 as well as exhibits to docket entry 58 Exhibit 58-3 pages 31 to 42. Furthermore, defendants Coinbase are actively obstructing evidence in violation of 18 USC Section 1512 whereas they have deliberately removed specific transaction of my transaction history as related to my receiving approximately 11.8 billion FEG Tokens in my Coinbase Wallet which were transferred from my Nano Ledger X hard wallet. Whereas I took screenshots of the completion of said transaction which as of September of 2024 have now been removed, which I assert was initiated to prevent me access to evidence to substantiate my claims. (See Exhibit A FEG TOKEN Swap Transaction Obstructed and Exhibit B FEG TOKEN SWAP Original) Here, reviewing the transactions you can see that the original shows that on June 23rd 2023 at 9:53 A.M. 11,597,080,968,357 FEG Token's were swapped for 11,833.756

FEG Token [New]. However, the obstructed transaction history has removed that transaction from my history, furthermore, because Coinbase deliberately withheld the price data for the New FEG Token contract so there was no associated price data for the original or new contract for FEG Token, whereas, when I transferred the tokens into my Coinbase wallet on June 23rd 2023, the USD value of the tokens did not display as it had in my Ledger Nano X hard wallet and I was prevented for transferring the tokens into Ethereum token as I had done with all my other investments (See Exhibit C Swapped ETH for EQX 8-16-2021 and Exhibit D Swapped EQX for ETH 8-17-2021 as well as Exhibit E Swapped ETH for BIT 8-22-2021 and Exhibit F Swapped BIT for ETH 8-22-2021). A review of the complaints will show customer support also confirmed that no price data was available for the tokens via the email thread concerning the issue, (See Exhibit G Email With Coinbase Customer Support Concerning FEG Token Dated June 23rd 2023 to July 6th 2023), specifically Coinbase's response dated July 4th 2023 at 6:22pm and July 5th 2023 at 9:15 P.M. I assert that this was due to misappropriation of trade secrets perpetuated by defendants Mr. Sean C. Carter, Roc Nation LLC and Live Nation Entertainment Inc (Live Nation Entertainment Inc. via the single firm violation doctrine), in exclusion of utilization of essential facilities. Finally, that Coinbase has breached its contract and fiduciary duty, pursuant to : 3. Payment Services, Purchase and Sales Transactions, and Credit Transactions; 3.8 Account Information and 3.9 Reversals and Cancellations, whereas Coinbase was required to have both the FEG Token and FEG Token New USD valuations for both tokens as was being reported in my Nano Ledger X hard wallet. Further, that Coinbase deliberately withheld said information and deprived me of access to Ethereum within Coinbase wallet to liquidate the assets once transferred into Coinbase wallet from my Nano Ledger X hard wallet. Coinbase has also waived the right to arbitration in the event an aggrieved party seeks equitable relief for the misappropriation of trade secrets pursuant to the terms of the user agreement as held

in Appendix 5: Arbitration Agreement 1.1 Applicability of Arbitration Agreement (2), where it states, you or Coinbase may seek equitable relief in court for infringement or other misuse of intellectual property rights (such as trademarks, trade dress, domain names, trade secrets, copyrights and patents). Therefore seeking to compel me to submit to binding arbitration where that right has been waived by the defendant and counsel for defense is aware of this is a FRCP 11 (b) (1) and (4) violation with no other intent but to deprive me of accessing the truth on the merits and relief and rescinding of the smart contract of FEG token worth over 3.04 million dollars so that I may grow my business and conduct my personal affairs. I further object to counsel for defense contentions and denials as hearsay, where they have no knowledge concerning the presented evidence in either the initial or amended complaints and such denials submitted are to prove a fact which is disputed, therefore I object pursuant to FRE 806 and call all relevant Coinbase customer service representatives as witness in relation to the stated transactions.

C) I assert that NYCHA's denials are also in violation of FRCP 11 (b) (1) and (4) where the denials present no evidentiary support in there assertions concerning the initial or amended complaint and as specifically asserted in Docket entry 57 Point 3. Discrimination B) (See Exhibit H Property Manager Verhonda Johnson Email Grievances Concerning Submitted Grievances and Ongoing Harassment From NYCHA employees and Representatives). I object to counsel for defense contention of denials as hearsay, whereas they have no direct knowledge and call Ms Verhonda Johnson as a witness to impeach the declarants denials in accordance and as supported by the evidence, pursuant to FRE 806.

D) I assert that Live Nation Entertainment Inc.'s denials of factual contentions are not based on the evidence, whereas no evidentiary support of said denial concerning the emails sent to Corporate Officers of Live Nation Entertainment Inc. CEO Michael Rapino former VP of

Corporate Communications and Social Impact Kaitlyn Henrich as well as V.P of Live Nation Entertainment Inc. Special Events Barbara Bellman (See Docket Entry 1 Initial Complaint Exhibit A1 Purchase Request For Distribution of Sound Recordings And Concert Promotion) are in violation of FRCP 11 (b) (1) and (4). I further object to counsel for defendants Live Nation Entertainments assertions that the emails where not sent, and or somehow fraudulent as hearsay pursuant to FRE 801 and 802 whereas that such declarations and denials are being presented to prove a fact by counsel who has no personal knowledge concerning my request for services. Furthermore, I left numerous voice messages requesting an update concerning my emails, calling Live Nation Entertainments Special Event Dept VP Barbara Bellmen at the number dedicated for that purpose on the company's website to no avail. I have confirmed as of today September 29th 2024 that Barbara Bellmen is still the Vice President of Live Nation Entertainments Special Events which is who I left voice mail messages with following up on the information I requested concerning the stated services. Wherefore, pursuant to FRE 806 I object to the assertions of denials by counsel for defense as hearsay which is unsupported by any documentary evidence or substantive testimony by a declarant with adequate knowledge related thereto and further call stated corporate officers as witnesses in relation thereto.

AFFIRMATION:

I Bernard T. Anderson Bey, the affiant hereby assert under penalty of perjury that the assertions made supra in the Affidavit Statement of Material Facts are of my own knowledge true and correct in support of my claims as supported by the evidence.

Dated: September 29, 2024

Signed: Bernard T. Anderson Bey
Plaintiff

MEMORANDUM OF LAW IN SUPPORT

1. PURSUANT TO FRCP 8 (b)(6) EFFECT OF FAILING TO DENY IF A RESPONSIVE PLEADING IS NOT REQUIRED, AN ALLEGATION IS CONSIDERED DENIED OR AVOIDED HOWEVER PURSUANT TO FRCP 11 (b) (1) AND (4) REPRESENTATIONS IN MOTIONS MAY NOT BE SUBMITTED FOR THE PURPOSE OF UNDUE DELAY AND MUST BE SUPPORTED BY THE EVIDENCE WHICH DEFENDANTS MOTIONS ARE NOT AND ARE OBJECTED TO AS INADMISSIBLE AS HEARSAY AS OUT OF COURT STATEMENTS THAT LACK BOTH PERSONAL KNOWLEDGE AND EVIDENTIARY SUPPORT IN REBUTTAL TO THE CLAIMS.

Under FRCP 11's 1983 Amendment the rule allowed for the striking of pleadings and motions as sham and false but was deleted, whereas it was held motions under the said provision presented issues better dealt with under rules 8, 12, or 56. See *Murchison v. Kirby* 27 F.R.D. 14 (S.D.N.Y. 1961). As here, the defendant's failure to submit evidentiary support rebutting the assertions and evidence presented in the claims as presented supra. Further, an abuse of discretion is established if the court bases its ruling on an erroneous view of the law or on a clearly erroneous assessment of the evidence (See *Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384 (1990)). Whereas substantive testimony concerning the evidence is needed to impeach the defendants denials. I also intend to move for injunctive relief concerning the claims of misappropriation to rescind the smart contract and discrimination for access to essential facilities and on the basis thereof the motion should be converted to a motion for summary judgement pursuant to FRCP 12 (c) and (d) and pursuant to *Palin v NY Times Co.* 933 F.3d 160 (2d Cir. 2019). Whereas the integral documents in evidence require witnesses to be called for purposes of impeachment in accordance with FRE 806. Finally, pursuant

to FRE 611 (a) The court can exercise control over the examination of witnesses to (1) make those procedures effective for determining the truth; and (2) avoid wasting time.

REQUESTED RELIEF: A pretrial hearing to hold oral admission for all stated witnesses and all applicable parties to impeach testimony based upon the evidentiary supports on the disputed factual contentions, that the court provide clarity as to the evidence required to prove the present causes of action before the court and all applicable legal standards in reference pursuant to FRCP 1, 16, and FRE 611, applicable attorneys fees, an order directing the defendants to answer the complaint or submit a motion for a more definite statement whereas any defects in pleading may warrant and any and all other further relief the court deems appropriate and necessary.

Dated: September 29, 2024

Signed: Bernard T. Anderson Bey

Plaintiff



Bernard Bey <tzpsinc@gmail.com>

[Reply] Case #15854385

8 messages

Coinbase Support <help@coinbase.com>
To: "tzpsinc@gmail.com" <tzpsinc@gmail.com>

Fri, Jun 23, 2023 at 10:32 PM

Hello Bernard,

Thank you for reaching out, we are happy to continue supporting you in this email thread.

We appreciate your patience with providing some additional requested context. Please note that the Coinbase Wallet app is not the same product as the Coinbase Exchange. The Wallet app is a user-controlled, non-custodial product that Coinbase cannot access on behalf of the customer under any given circumstances. These two platforms operate independently from each other, with their own features and functionalities.

We are unable to see any activity within your Coinbase Wallet app therefore we rely on visual material and other details, in order to investigate further.

Could you please provide screenshots/screen recordings of where you're having trouble? Please send these as attachments. We will not be able to see your images when they are inserted in the body of your email.

- In addition to help us support you, please also provide the following:
- 1. Your Coinbase Wallet username/[cb.id](#)
 - 2. Link/URL of the transaction hash (for more information about this and how to locate it, please refer to this article: <https://help.coinbase.com/en/coinbase/getting-started/crypto-education/what-is-a-transaction-hash-hash-id>)

If your query does not relate to the Coinbase Wallet product, please do let us know and we'll be happy to redirect you to the appropriate team.

We look forward to your response!

Regards,
Coinbase Support

thread::D-17ZoSoBj2KujmoKyNlyBl::

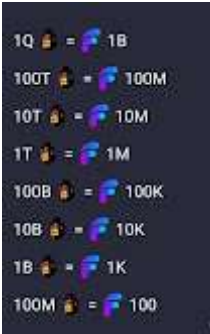
Bernard Bey <tzpsinc@gmail.com>
To: Coinbase Support <help@coinbase.com>

Fri, Jun 23, 2023 at 11:00 PM

Good evening this is Bernard Bey I'm contacting Coinbase Support concerning the price of the coin and valuation for the transaction. In my Ledger Nano X it gave me the proper price per token for 11.83 billion tokens @ approximately 0.00026 cents The screen shot shows a balance of \$3.05 for the full valuation. Which is inaccurate and should show the current value of over \$3 million dollars.

[Quoted text hidden]

6 attachments



IMG_20230205_164201_004.jpg
37K



Screenshot_20230623-090850.png
189K



Screenshot_20230623-092142.png
378K



Screenshot_20230623-085824.png
246K



IMG_20230622_220105669.jpg
3320K



Screenshot_20230623-102548.png
201K

Coinbase Support <help@coinbase.com>
To: "tzpsinc@gmail.com" <tzpsinc@gmail.com>

Fri, Jun 23, 2023 at 11:33 PM

Hello Bernard,

Thank you for your patience as we looked into your concern. I'd like to provide you with some additional information regarding price data in your Coinbase Wallet.

The Coinbase Wallet pulls token values from other exchange APIs, to aggregate a price feed for the tokens. This data will vary depending on the activity at that time but the Wallet itself does not set the value for the token, nor does any other crypto wallet.

We'd like to reassure you that in such instances of either a missing or fluctuating price data for a token, your ability to transact with it in Coinbase Wallet will not be affected. If you are still able to view the token, you are the rightful owner and can trade or move this as you see fit.

Usually, if the fiat value of a token extends beyond seven decimal points, the app will not display it but you can still use an external tool to check for this, such as the linked websites below:

- <https://coinmarketcap.com/>
- <https://www.coingecko.com/>
- <https://etherscan.io/>

Upon further checking, we can confirm that you've **11,833.756090160095673 FEG** at its new contract address. You may review it here:
<https://etherscan.io/token/0xbededDf2eF49E87037c4fb2cA34d1FF3D3992A11?a=0x3A13F36E4907008406DA35261A438330c78cd2A7>

We hope you find this helpful, feel free to reach back out for any further queries.

Kind regards,
Coinbase Support Team

thread::D-17ZoSoBj2KujmoKyNlyBI::

Bernard Bey <tzpsinc@gmail.com>
To: Coinbase Support <help@coinbase.com>

Sat, Jun 24, 2023 at 12:46 AM

This does not correct the value of my current investment. I purchased 11,745,318,471.787152 at 2.52 cents on Sept 1st 2021. The valuation of the coin was at the hundred millionth decimal place or below when I acquired the tokens. Whereas due to the increase in value approximately 11.83 billion coins at 0.00026 is valued over 3 million dollars. However Coinbase wallet has not properly submitted the full value of over 3 million dollars into my Coinbase wallet. Due to the migration of the Feg token of 1000000 to 1 I was left with 11830 FEG which is still valued at over 3 million dollars. Whereas 11830 FEG tokens under the new contract is equivalent to 11.83 billion tokens under the new contract. 11,830,000,000 billion tokens multiples by 0.00026 which was the approximate price per token at the time of transfer of my tokens into my Coinbase Wallet equals \$3,075,800. However the full value of said assets is not currently in my Coinbase wallet. It is only showing a value of \$3.50 which does not reflect the current market price for the 11.83 billion tokens at the current price reflected on Coin Market Cap of \$0.00026 USD. The assets in my Coinbase wallet should reflect it's full value of over 3 million dollars as I previously stated as the screen shots I've submitted as shows however those monies are not available in. My wallet. Please reach out to me with next appropriate steps. I have already submitted screen shots in support of my position.

[Quoted text hidden]

Coinbase Support <help@coinbase.com>
To: "tzpsinc@gmail.com" <tzpsinc@gmail.com>

Tue, Jul 4, 2023 at 6:22 PM

Hello Bernard,

Thank you for reaching back out. We are sorry for the delayed response and we appreciate your patience.

As previously mentioned, Wallet itself does not set the value for the token, nor does any other crypto wallet. You may refer to this transaction hash where it shows that your wallet address received **11,833.756090160095673 FEG (NEW)** from 11,597,080,968.356893761 FEG (OLD)

<https://etherscan.io/tx/0x516d6fe64e2a4d134f52739ef45bed84fa55501f6692b3261b3d80f239c28c64>

We recommend reaching out to the token developer directly for more assistance regarding this token.

Thank you for your understanding regarding this issue. Please let me know if there's anything else that we can assist you with.

[Quoted text hidden]

Bernard Bey <tzpsinc@gmail.com>
To: Coinbase Support <help@coinbase.com>

Tue, Jul 4, 2023 at 7:23 PM

I have reached out to FEG support and they expressed that if the value of my FEG Tokens was \$100 before migration I was entitled to \$100 after migration. The value of my FEG Tokens based on the tokenomics presented in the initial white paper was approximately \$3,045,000 due to the appreciation of the token and the burning of the tokens which I held for 2 years, any actions by FEG to rug pull the appreciative value of the tokens with improper meta data submissions during the FEG token migration equates to fraud. I have submitted the value of the tokens I exchanged during the token migration with FEG. I am entitled to the full appreciative value of the tokens. Based on my initial purchase of said tokens. Likewise I am entitled to protection of the full value of said asset from fraud pursuant to 23 CRR-NY 200.9 Custody and Protection of Customer Assets. I have submitted evidentiary support concerning the valuation of FEG Token based off of Coin Market Cap and or Coin Geico valuations presented to Coinbase Wallet.

11,597,080,968 FEG Old Tokens multiples by the New FEG Token price of 0.00026. Extracting the appreciative value is Fraud on part of FEG. And whereas I have now filed a claim with Coinbase concerning said fraud for the full value of the loss associated there with.

[Quoted text hidden]

Coinbase Support <help@coinbase.com>
To: "tzpsinc@gmail.com" <tzpsinc@gmail.com>

Wed, Jul 5, 2023 at 9:15 PM

Hello Bernard,

Thank you for your patience while we looked into your concern.

As mentioned, we rely on an exchange API to populate price data in Coinbase Wallet, and this data is subject to change.

We have also noticed that the said token does not have a fiat value on etherscan. It's possible that the source has stopped showing a value for it and may also be the reason why it has no fiat value listed inside your Coinbase Wallet app. You may check the link below:
<https://etherscan.io/address/0x3A13F36E4907008406DA35261A438330c78cd2A7>

You can always check your token on Etherscan for an updated price feed, and if there is no price value next to the token, it means that there won't be any value in your Coinbase Wallet app either.

Our best recommendation is for you to contact back the place where you originally gained this token from, or directly contact the token founders for more price information and to confirm if the token is still tradable.

If you would like to file a formal complaint with Coinbase, please use this form: <https://help.coinbase.com/en/contact-us/submit-a-complaint>

For more information, please visit: https://help.coinbase.com/en/coinbase/other-topics/other/how-to-send-a-complaint?b_id=13521?ref=es

We hope this information helps.

Kind regards,
Coinbase Support

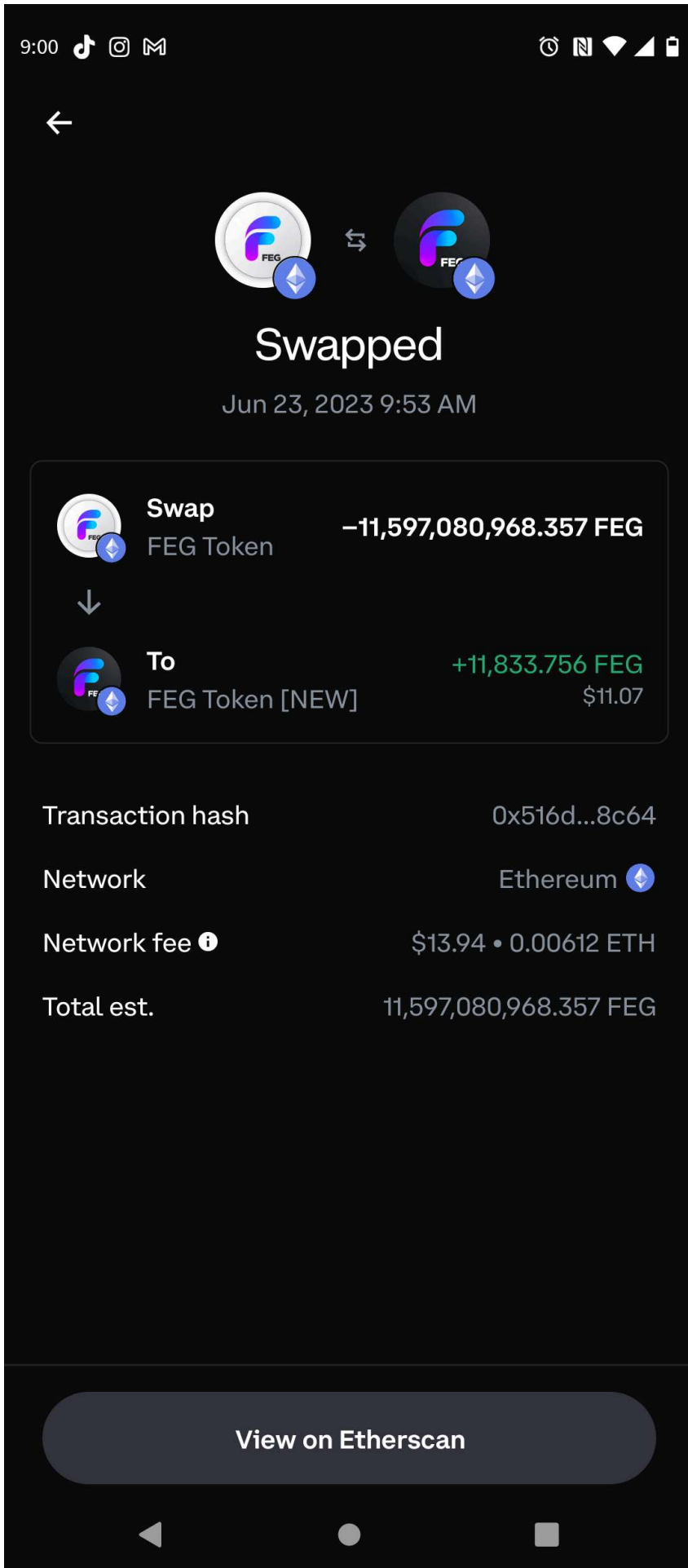
thread::D-17ZoSoBj2KujmoKyNlyBl::

Bernard Bey <tzpsinc@gmail.com>
To: Coinbase Support <help@coinbase.com>

Thu, Jul 6, 2023 at 10:52 AM

Good Morning, My complaint is focused on the FEG token migration there are two contracts for FEG the approximate 12 billion tokens I purchased and stored where not swapped for equal value by FEG Token Founders, the forced token migration is a rug pull of the initial investment from investors by the founders. This equates to misrepresentation, fraud and breach of contract. I stored my investment on my Ledger Nano X the API gave the fiat value for both the old FEG contract as well as the fiat value under the new FEG Contract. (Please see attachment 5 Ledger Nano x API valuations for FEG Token for both the New and Old Contract) Under the new contract the fiat value is over 3 Million Dollars. After reviewing my investment and seeing the appreciation of it to a fiat value of over 3 million dollars I immediately began the process of transferring it to my Coinbase wallet to utilize as collateral for corporate expansion. I was given approximately 11,833 FEG tokens after token migration at the FEG founders dedicated website address for said purpose in the browser of Coinbase Wallet. For a value of a lil over 3 dollars, this does not reflect the full appreciation of the coins value under the new contract to which I am entitled based on the full value of the appreciation of FEG token whereas I submit this insurance claim for the full value of the 11, 833,756,061 ,581 FEG tokens transferred into my Coinbase wallet on June 23 2023 at the CoinMarketCap/API fiat value of 0.0002576 per FEG Token for a value of \$3,048,375,561 USD fiat value. pursuant to 23 CRR-NY 200.9 Custody and Protection of Customer Assets.

[Quoted text hidden]



Transactions

[Filter](#)

DEC 19, 2021



Received

From 0xddfa...0740

+\$9.64

0.00409 ETH



Received

From 0x3cd7...9699

+\$14.95

0.00634 ETH



Sent

To 0x085b...9dc4

1,010.708 BIT



Sent

To 0x843a...7ea6

-\$17.17

0.00729 ETH

JUN 23, 2023



Received

From 0xb7b6...b678

+\$21.50

0.00912 ETH



Smart contract executed

-\$2.37

0.001 ETH



Received

From 0xb7b6...b678

+\$192.35

0.0816 ETH



Sent

To 0x0a78...18c8

-\$196.92

0.0836 ETH

JUL 03, 2023





Bernard Anderson Bey <bernardandersonbey@gmail.com>

XRF Inspection Dated November 17th 2023

5 messages

Bernard Anderson Bey <bernardandersonbey@gmail.com>
To: verhonda.johnson@nycha.nyc.gov

Fri, Nov 17, 2023 at 3:21 PM

I received a notice today to call to schedule xrf inspection at the following number (347) 222-6269. Please be made aware that my apartment was XRF tested prior to our leasing of the premises as you Ms Verhonda Johnson verified as the property manager when I was present with the lease for myself and youngest daughter. As I have stated in my grievances dated December 6th 2022 and March 16th 2023. A new residence must be provided if new testing and any work needs to be completed. As I have stated in said grievances this repeated request is only being initiated to displace me and my daughter. When we spoke previously you stated that if any work needed to be completed we would be placed in a hotel. As I know this is the main goal and not any specific safety goals. NYCHA has had a history of falsifying documents and records with my case as was perpetuated initially to prevent me from securing a lease for me and my daughter. Civil action 19-cv-03859 whereas Ms Carcamo provided false information on my application due to political influence to prevent a co application with myself and daughter. As well as misinformation concerning my lease information and other records. Therefore I requested another permanent residence prior to any testing and work to our current residence due to said history. I have no issue with cooperating with NYCHA. However because I know for certain the true reason for these multiple request is to displace us from a permanent residence which will effect other present litigation of a family and civil nature. These protections need to be in place prior to your request being initiated. However I have repeatedly stated this and my grievances remain unanswered. Please contact me at your earliest convenience so that the situation may be rectified. Also I have received repeated calls from NYCHA concerning this although I have repeatedly stated my position via the stated grievances which have remained unanswered accept for the threat to drill my locks if I do not cooperate. That is illegal eviction and Harassment from the free enjoyment of the premises. I'm only seeking to live and work in peace these activities are preventing me from doing so. Thank you for your attention to these matters

Respectfully,
Bernard Bey
(929) 722-6288

Bernard Anderson Bey <bernardandersonbey@gmail.com>
To: monitor@nychamonitor.com, verhonda.johnson@nycha.nyc.gov

Fri, Nov 17, 2023 at 3:51 PM

----- Forwarded message -----

From: **Bernard Anderson Bey** <bernardandersonbey@gmail.com>
Date: Fri, Nov 17, 2023, 3:21 PM
Subject: XRF Inspection Dated November 17th 2023
To: <verhonda.johnson@nycha.nyc.gov>

I received a notice today to call to schedule xrf inspection at the following number (347) 222-6269. Please be made aware that my apartment was XRF tested prior to our leasing of the premises as you Ms Verhonda Johnson verified as the property manager when I was present with the lease for myself and youngest daughter. As I have stated in my grievances dated December 6th 2022 and March 16th 2023. A new residence must be provided if new testing and any work needs to be completed. As I have stated in said grievances this repeated request is only being initiated to displace me and my daughter. When we spoke previously you stated that if any work needed to be completed we would be placed in a hotel. As I know this is the main goal and not any specific safety goals. NYCHA has had a history of falsifying documents and records with my case as was perpetuated initially to prevent me from securing a lease for me and my daughter. Civil action 19-cv-03859 whereas Ms Carcamo provided false information on my application due to political influence to prevent a co application with myself and daughter. As well as misinformation concerning my lease information and other records. Therefore I requested another permanent residence prior to any testing and work to our current residence due to said history. I have no issue with cooperating with NYCHA. However because I know for certain the true reason for these multiple request is to displace us from a permanent residence which will effect other present litigation of a family and civil nature. These protections need to be in place prior to your request being initiated. However I have repeatedly stated this and my grievances remain unanswered. Please contact me at your earliest convenience so that the situation may be rectified. Also I have received repeated calls from NYCHA concerning this although I have repeatedly stated my position

via the stated grievances which have remained unanswered accept for the threat to drill my locks if I do not cooperate. That is illegal eviction and Harassment from the free enjoyment of the premises. I'm only seeking to live and work in peace these activities are preventing me from doing so. Thank you for your attention to these matters

Respectfully,
Bernard Bey
35 Dwight Street Apt 6B
Brooklyn NY 11231
(929) 722-6288

Bernard Anderson Bey <bernardandersonbey@gmail.com>
To: NYCHAOIG@doi.nyc.gov

Fri, Nov 17, 2023 at 3:53 PM

----- Forwarded message -----

From: **Bernard Anderson Bey** <bernardandersonbey@gmail.com>
Date: Fri, Nov 17, 2023, 3:21 PM
Subject: XRF Inspection Dated November 17th 2023
To: <verhonda.johnson@nycha.nyc.gov>

[Quoted text hidden]

Iannuzzi, Ralph <ralph.iannuzzi@nycha.nyc.gov>
To: Bernard Anderson Bey <bernardandersonbey@gmail.com>
Cc: Inspector General <ig@nycha.nyc.gov>

Fri, Nov 17, 2023 at 3:59 PM

You have reached the New York City Housing Authority Office of the Inspector General.

The Office of the Inspector General, which is supervised by the New York City Department of Investigation, is responsible for the investigation and elimination of corrupt or other criminal activity, conflict of interest, and unethical conduct by NYCHA officers and employees, residents or persons doing business with or receiving funds directly or indirectly from NYCHA.

Your matter does not fall under this Office's jurisdiction.

Thank you.

Ralph M. Iannuzzi
NYCHA Inspector General
Department of Investigation
(917) 662-7841

From: Bernard Anderson Bey <bernardandersonbey@gmail.com>
Sent: Friday, November 17, 2023 3:53:03 PM

To: NYCHAOIG <OIGNYCHA@doi.nyc.gov>

Subject: Fwd: XRF Inspection Dated November 17th 2023

----- Forwarded message -----

From: **Bernard Anderson Bey** <bernardandersonbey@gmail.com>

Date: Fri, Nov 17, 2023, 3:21 PM

Subject: XRF Inspection Dated November 17th 2023

To: <verhonda.johnson@nycha.nyc.gov>

[Quoted text hidden]

Bernard Anderson Bey <bernardandersonbey@gmail.com>

Thu, Feb 29, 2024 at 9:59 AM

To: verhonda.johnson@nycha.nyc.gov

Good morning Ms Johnson, I have received another request for additional XRF testing for March 1st 2024 after I filed a recent complaint with the city. A copy of previous XRF testing was uploaded to MY NYCHA account which I downloaded for my records. My position remains the same. The Red Hook Management office has not responded to any of my grievances concerning my repeated requests for cooperation. This is evidence of bad faith on part of NYCHA and the management office in rectifying the situation lawfully. If anyone else contacts me concerning this with out addressing my grievances i will now for a temporary restraining order initial and after presenting my claim a permanent injunction against NYCHA as well as damages for intentional infliction of emotional distress against Redhook West 's Manager and Assistant manager. Including illegal eviction if necessary. I am currently still in litigation with Roc Nation LLC and Live Nation Entertainment Inc. While I am up for appeal for the first civil action I may still seek a TRO from the appellate court for the second circuit, or alternatively include it under my new civil actions claims of Fraud Upon The Court by Jay Z and Roc Nation pursuant to FRCP 60 (3) under my claims of industrial espionage/ pursuant to The Defend Trade Secrets Act. Please cease and decisit all attempts to gain access until my grievances have been answered and addressed. Thank you

Respectfully,
Bernard Bey
(929) 722-6288

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